

JOHN P. POLCASTRO, JR.
PLAINTIFF

RECEIVED
CIVIL ACTION NO.
1:05-cv-00909-MEF-VPM

v.

GREG WARD, ET. AL
DEFENDANT

U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

MOTION FOR DISCOVERY

COME NOW JOHN P. POLCASTRO SR, PLAINTIFF
IN THE ABOVE STYLED CASE, AND SUBMITS HIS
REQUEST FOR DISCOVERY.

ON OR ABOUT AUGUST 1ST 2005,
Deputy Perez from the Geneva County Sheriff's
Dept. took pictures of Plaintiff's face. Deputy
Perez, No. 2413 stated, And it quate, (I'm
taking these pictures in case you ever
need them, I'm not getting blamed for
this, end of quote)

Many Requests were made to
HEAD JAILER ROWE FOR COPIES OF THESE
PICTURES. NONE WERE ANSWERED

PLAINTIFF REQUESTS COPIES OF
THOSE PICTURES. AND COPIES OF ALL PICTURES
TAKEN WHEN PLAINTIFF WAS LOCKED INTO THE
GENEVA COUNTY JAIL.

THESE PICTURES WILL SHOW
THAT DEPUTY RAY MOCK HAD TO THE COURT
WHEN HE SAID ALL HE DID WAS PUSH
PLAINTIFF AWAY FROM HIM. THE UN ANSWERED
QUESTION IS, HOW MANY TIMES WAS

Plaintiff Plaintiff requests copies be sent to him and the Court.

Respectfully submitted this 7th day of August, 2006.

John P. Polcastro, Esq. Plaintiff
245108 3/97
3800 Fourways
Atlanta, GA 30339

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of August, 2006, I have served the foregoing documents on the following:

MR. RICHARD HILL, JR.
ATTORNEY FOR DEFENDANT
WEBB & ELEY, P.C.
7475 Rockwood Pointe Drive, 36017
P.O. Box 280909
Montgomery, AL 36184

by placing a true and correct copy of the foregoing to the U.S. Mail, postage prepaid, on this the 7th day of August, 2006.

John P. Polcastro, Esq.
Plaintiff, Pro Se
John P. Polcastro, Esq.